

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

ERIN ELAINE THOMAS

Defendant.

Case: 2:23-cr-20092

Judge: Edmunds, Nancy G.

MJ: Stafford, Elizabeth A.

Filed: 02-10-2023

INFO USA VS THOMAS (DP)

Violation: 18 U.S.C. § 1349

**INFORMATION**

THE UNITED STATES ATTORNEY CHARGES THAT:

**GENERAL ALLEGATIONS**

At times relevant to this Information:

**The Scheme to Defraud**

1. Between on or about February 1, 2020, to on or about January 26, 2021, INDIVIDUAL-1 devised a scheme to defraud several states and the federal government by filing fraudulent unemployment insurance claims using the personal information of individuals without their knowledge or consent, or who were not eligible to receive benefits, or both.

2. The purpose of the scheme to defraud was to obtain money by, among other things, submitting fraudulent unemployment insurance claims.

3. As a result of fraudulent claims filed as part of the scheme, wire transmissions were sent from the state of California to data centers in other states in order to direct payment of unemployment benefits to the purported claimants.

4. While located in the Eastern District of Michigan, INDIVIDUAL-1 conspired with other individuals, including ERIN THOMAS, to assist with and participate in his scheme.

5. ERIN THOMAS knowingly participated in the scheme from on or about April 1, 2020, through January 26, 2021.

6. In furtherance of the scheme, INDIVIDUAL-1 and ERIN THOMAS communicated via text message and telephone while INDIVIDUAL-1 was located in the Eastern District of Michigan.

7. In furtherance of the scheme, ERIN THOMAS collected mail correspondence in relation to fraudulent claims at the request and direction of INDIVIDUAL-1.

**COUNT ONE**

18 U.S.C. § 1349

*Conspiracy to Commit Wire Fraud*

8. Paragraphs 1 through 7 of this Information are realleged and incorporated by reference as though fully set forth herein.

9. From on or about April 1, 2020, to on or about January 26, 2021, in the Eastern District of Michigan, and elsewhere, INDIVIDUAL-1 and ERIN THOMAS, did knowingly, intentionally, and willfully combine, conspire, confederate, and agree with each other and other individuals, to commit wire fraud, that is, knowingly, willfully, and with the intent to defraud, having devised and intending to devise a scheme and artifice to defraud, and to obtain money and property by means of

materially false and fraudulent pretenses, representations, and promises, knowing such pretenses, representations, and promises were false and fraudulent when made, transmit and cause to be transmitted, by means of wire, radio, and television communication, writings, signals, pictures, and sounds in interstate and foreign commerce for the purposes of executing such scheme and artifice, all in violation of Title 18, United States Code, Sections 1343 and 1349.

### **FORFEITURE ALLEGATIONS**

10. Pursuant to Fed. R. Cr. P. 32.2(a), the government hereby provides notice to the defendant of its intention to seek forfeiture of all proceeds, direct or indirect, or property traceable thereto, all property that facilitated the commission of the violations alleged, or property traceable thereto, and all property involved in, or property traceable thereto, of the violations set forth in this Information.

11. Substitute Assets: If the property described above as being subject to forfeiture, as a result of any act or omission of defendant:

- a. Cannot be located upon the exercise of due diligence;
- b. Has been transferred or sold to, or deposited with, a third party;
- c. Has been placed beyond the jurisdiction of the Court;
- d. Has been substantially diminished in value; or
- e. Has been commingled with other property that cannot be divided without difficulty;

the United States of America shall be entitled to forfeiture of substitute property pursuant to Title 21, United States Code, Section 853(p), and Title 28, United States Code, Section 2461(c).

DAWN N. ISON  
United States Attorney

JOHN NEAL  
Assistant United States Attorney  
Chief, White Collar Crime Unit



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Dated: February 10, 2023

United States District Court Eastern District of Michigan	<b>Criminal Case Cover Sheet</b>	Case Number
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NOTE: It is the responsibility of the Assistant U.S. Attorney signing this form to complete it accurately in all respects.

<b>Companion Case Information</b>	Companion Case Number: 21-20510/22-20094
This may be a companion case based upon LCrR 57.10 (b)(4) <sup>1</sup> :	Judge Assigned: Levy / Hood 22-20543(restart)
<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	AUSA's Initials:

**Case Title:** USA v. Erin Elaine Thomas

**County where offense occurred :** Wayne

**Check One:** ☒ **Felony** ☐ **Misdemeanor** ☐ **Petty**

☐ Indictment/ ☐ Information --- no prior complaint.  
☐ Indictment/ ☒ Information --- based upon prior complaint [Case number: 21-mj-30384 ]  
☐ Indictment/ ☐ Information --- based upon LCrR 57.10 (d) [Complete Superseding section below].

### **Superseding Case Information**

**Superseding to Case No:** \_\_\_\_\_ **Judge:** \_\_\_\_\_

- ☐ Corrects errors; no additional charges or defendants.  
☐ Involves, for plea purposes, different charges or adds counts.  
☐ Embraces same subject matter but adds the additional defendants or charges below:

<u>Defendant name</u>	<u>Charges</u>	<u>Prior Complaint (if applicable)</u>
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**Please take notice that the below listed Assistant United States Attorney is the attorney of record for the above captioned case.**

February 10, 2023  
Date

s/ Meghan S. Bean  
 Meghan Sweeney Bean  
 Assistant United States Attorney  
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<sup>1</sup> Companion cases are matters in which it appears that (1) substantially similar evidence will be offered at trial, or (2) the same or related parties are present, and the cases arise out of the same transaction or occurrence. Cases may be companion cases even though one of them may have already been terminated.